

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC, EXPERIAN INFORMATION
SOLUTIONS, INC., TRANS UNION, LLC,
and UNKNOWN DOES 1-100,

Defendants.

CASE NO.: 2:21-cv-03603-BHH-MGB

**DEFENDANT TRANS UNION LLC'S
ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES**

Trans Union LLC, a Defendant herein, hereby files its Answers to Local Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None known at this time.

B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: The claims appear to be causes of action triable by a jury.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Trans Union LLC is a wholly owned subsidiary of TransUnion Intermediate Holdings, Inc. TransUnion Intermediate Holdings, Inc. is wholly owned by TransUnion. TransUnion is a publicly traded entity. Investment funds affiliated with T. Rowe Price

Group, Inc., a publicly traded entity, own more than 10% of TransUnion's stock. No public company directly owns 10% or more of the ownership in Trans Union LLC. Trans Union does not own 10% or more of the outstanding shares of a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Trans Union does not challenge the appropriateness of the division.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

- A. (1) 2:19-cv-03456-BHH, *Nelson L. Bruce v. Bank of America, N.A., et. al.*,**
(2) The allegations in this case arise out of alleged unauthorized Bank of America's inquiries on Plaintiff's Trans Union credit file.
(3) The case is open and pending a final ruling on Bank of America's Motion for Summary Judgment.
- B. (1) 2:21-cv-00895-BHH-MGB, *Nelson L. Bruce v. T-Mobile USA, Ina., et.al.*,**
(2) The allegations in this case arise out of an alleged unauthorized T-Mobile inquiry on Plaintiff's Trans Union credit file.
(3) The case is open and pending a final ruling on T-Mobile's Motion for Judgement on the Pleadings.
- C. 2:18-cv-02635-BHH, *Nelson L. Bruce v. Government National Mortgage Association, et. al.*,**

D. 2:17-cv-02171-BHH-MGB, *Nelson L. Bruce v. Carrington Mortgage Services, LLC, et. al.*,

E. 2:17-cv-02170-BHH, *Nelson L. Bruce v. Pentagon Federal Credit Union, et. al.*

F. If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Trans Union LLC is the proper name of this Defendant.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Trans Union LLC makes no such contention at this time but reserves the right to supplement its answer after discovery has been conducted.

Respectfully Submitted,

CLEMENT RIVERS, LLP

s/ Wilbur E. Johnson

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Counsel for Trans Union LLC

Dated: December 23, 2021
Charleston, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December 2021, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

None

I further certify that I forwarded a copy of the foregoing by U.S. First Class Mail to the following non-CM/ECF participants:

Nelson L. Bruce
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Pro Se Plaintiff

s/ Wilbur E. Johnson
WILBUR E. JOHNSON